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**BELLSOUTH**

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Guy M. Hicks  
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July 27, 2000

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VIA HAND DELIVERY

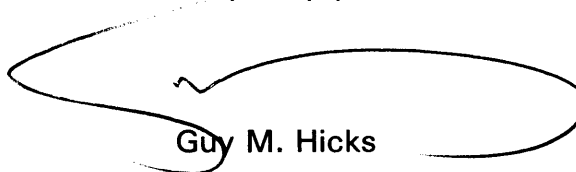
David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition for Arbitration of the Interconnection Agreement Between  
BellSouth Telecommunications, Inc. and Intermedia Communications  
Inc. Pursuant to Section 252(b) of the Telecommunications Act of  
1996*  
Docket No. 99-00948

Dear Mr. Waddell:

Enclosed are the fourteen copies of pages 30, 37, 40 and 41 of the Direct  
Testimony of Cynthia Cox filed July 18, 2000 in the above-referenced matter.  
These pages are being provided an abundance of caution as it has been brought to  
our attention that they may be missing from some of the copies originally filed with  
the Authority. A copy of the pages has been provided to Don Baltimore, counsel  
for Intermedia. We apologize for the inconvenience.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

***Issue 17: Should BellSouth be required to offer subloop unbundling and access to BellSouth-owned inside wiring in accordance with the UNE Remand Order and FCC Rule 319(a)?***

BellSouth understands that this issue has been resolved between the parties. However, BellSouth reserves its right to provide testimony on this issue if Intermedia should indicate otherwise.

***Issue 18: Should BellSouth be required to provide access to on an unbundled basis in accordance with, and as defined in, the FCC's UNE Remand Order, to the following:***

- a) local circuit switching,***
- b) local tandem switching and***
- c) packet switching capabilities?***

**Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?**

**A.** First, let me say that BellSouth understands the parties have reached agreements on subparts (a) and (b) of this issue; therefore, only subpart (c) remains unresolved. However, BellSouth reserves its right to provide additional testimony on this issue if Intermedia should indicate otherwise.

Regarding subpart (c), BellSouth contends that neither the 1996 Act nor the FCC's Rules require it to unbundle packet switching. In its UNE Remand Order, the FCC expressly declined "to unbundle specific packet switching

***Issue 23: Should the parties utilize a definition of interoffice transmission facilities consistent with the FCC's most recent ruling, that includes dark fiber, DS1, DS3 and OCn levels, and shared transport?***

As indicated above, the parties have agreed that this issue is subsumed in Issue 22.

***Issue 24: Should BellSouth provide nondiscriminatory access to operations support systems ("OSS") and should the parties utilize a definition of OSS consistent with the FCC's most recent ruling?***

BellSouth understands that this issue has been resolved between the parties. However, BellSouth reserves its right to provide testimony on this issue if Intermedia should indicate otherwise.

***Issue 25: Should BellSouth be required to furnish access to the following as UNEs: (i) User-to-Network Interface or "UNI", which provides connectivity between the end user and the frame relay network; (ii) Network-to-Network Interface or "NNI", which provides carrier-to-carrier connectivity to the frame relay network; (iii) Data Link Control Identifiers or "DLCI", at Intermedia-specified Committed Information Rates or "CIRs", which define the path and capacity of virtual circuits over which frame relay frames travel across the frame relay network?***

Q. PLEASE BRIEFLY EXPLAIN THIS ISSUE.

that call. On the other hand, if BellSouth's end user customer makes a long distance call that traverses Intermedia's network, BellSouth is due originating switched access.

Q. PLEASE FURTHER DISCUSS NPA/NXX ASSIGNMENT.

A. The general consensus of the telecommunications industry is that if a local exchange carrier assigns an NPA/NXX to an established exchange rate center, numbers assigned out of that NPA/NXX will be assigned to end users physically located in that rate center. As clearly established by the FCC, the jurisdiction of a call is not based upon the dialed digits, but the end-to-end points of the call (i.e., Feature Group A, Internet traffic). Therefore, the industry assumes that the call is delivered to an end user in the rate center to which the end user's telephone number is assigned.

BellSouth's concern arises when Intermedia and other CLECs associate their NPA/NXXs to established BellSouth exchange rate centers, but then assign numbers out of a particular NPA/NXX on a wholesale basis to end users outside the rate center to which that NPA/NXX is homed and, in some cases, outside the LATAs. When this occurs, BellSouth routes its originating traffic to the CLEC assuming it is a local call (due to the originating and terminating NPA/NXXs being assigned to the same exchange rate center). However, the CLEC delivers the traffic to an end user located outside the local calling area, and possibly in a different LATA. This causes BellSouth and other local exchange carriers to lose valid toll and/or switched access revenue, to incur

costs that are not recovered, and to inappropriately pay reciprocal compensation as if the traffic were indeed local.

Q. DOES BELLSOUTH HAVE A SOLUTION TO THIS PROBLEM?

A. BellSouth is currently working on a proposal that would enable Intermedia to retain the flexibility to assign telephone numbers as it sees fit, and would also address the monetary component of this issue. BellSouth plans to make a proposal to Intermedia as soon as it can finalize its proposal.

*Issue 31: For purposes of compensation, how should IntraLATA Toll Traffic be defined, e.g., should the definition include both voice and data traffic?*

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth has proposed the following language to Intermedia:

IntraLATA Toll Traffic is defined as any telephone call that is not local or switched access per this Agreement.

The intent of BellSouth's definition is to identify the traffic specific to BellSouth's General Subscriber Service Tariffs A18 and A19 as IntraLATA Toll Traffic. That is, BellSouth's definition of IntraLATA Toll Traffic is intended to include any calls that originate in one local calling area in the LATA and terminate in another local calling area in the LATA.

## CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

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